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12

13  Attorneys for Defendant, Counter-Claimant and
    Third-Party Plaintiff Renee Norwood

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15                     UNITED STATES DISTRICT COURT

16           NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO)

17  Adobe Systems Incorporated,          )   Case No. C10-3564 SI
                                         )
18                         Plaintiff,    )   JOINT STIPULATION RE
          v.                             )   CONTINUANCE OF HEARING DATE
19                                       )   ON PENDING MOTION TO DISMISS
    Renee Norwood, et al.,               )   AMENDED COUNTERCLAIMS
20                                       )
                          Defendants.    )
21  _____ )
                                         )
22        ALL RELATED CLAIMS             )
                                         )
23  _____ )

24

25        Plaintiff and Counter-Defendant Adobe Systems Incorporated ("Adobe"), Third-Party

26  Defendant Software & Information Industry Association ("SIIA"), and Defendant and Counter-

27  Claimant Renee Norwood ("Norwood") (collectively the "Parties"), by and through their respective

28  counsel of record, hereby stipulate and agree as follows:

    Adobe v. Norwood, et al.:  Stipulation re Continuance          - 1 -

WHEREAS Norwood filed her Amended Counterclaims on or about March 18, 2011;

WHEREAS Adobe and the SIIA filed their Motion to Dismiss the Amended Counterclaims ("Motion") on or about April 8, 2011;

WHEREAS the Parties stipulate that any delay in filing the Motion has not caused prejudice to Norwood and that Norwood waives any objections to the timeliness of the Motion, in the event this stipulation is entered by the Court;

WHEREAS the hearing on the Motion is currently set for May 13, 2011;

WHEREAS counsel for Norwood has a familial obligation on May 13, 2011, such that he cannot attend the hearing;

WHEREAS counsel for Norwood is currently preparing a motion to withdraw as counsel due to Norwood's unresponsiveness and lack of payment;

WHEREAS, if Norwood's current counsel is granted leave to withdraw as counsel, Norwood will need sufficient time to retain new counsel and/or prepare an opposition to the Motion;

WHEREAS, alternatively, should counsel's motion to withdraw not be granted, counsel will need sufficient time to prepare an opposition to the Motion and is not available for hearing prior to July 8, 2011;

WHEREAS the requested continuance will not affect any current Court deadlines; and

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Adobe v. Norwood, et al.: Stipulation re Continuance          - 2 -

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2       NOW, THEREFORE, Adobe, the SIIA, and Norwood stipulate and request the hearing on

3   Adobe and the SIIA's Motion be continued until July 8, 2011, or a date thereafter acceptable with

4   the Court, with all briefing dates adjusted accordingly.

    IT IS SO STIPULATED:
5

6   Dated: April 19, 2011                        J. Andrew Coombs, A Professional Corp.

7

8                                                By: __/s Nicole L. Drey_____
                                                        J. Andrew Coombs
9                                                       Nicole L. Drey
                                                 Attorneys for Plaintiff and Counter-Defendant Adobe
                                                 Systems Incorporated and Third-Party Defendant
10                                               Software & Information Industry Association

11

12  Dated: April 19 , 2011                       Rodenbaugh Law

13

14                                               By: __/s Michael L. Rodenbaugh_____
                                                        Michael L. Rodenbaugh
                                                 Attorneys for Defendant and Counter-Claimant Renee
15                                               Norwood

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17                                    **[PROPOSED] ORDER**

18  PURSUANT TO REQUEST, IT IS SO ORDERED.

19  DATED: __4/19/11_____, 2011

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21                                               _____
                                                 Hon. Susan Illston
22                                               UNITED STATES DISTRICT JUDGE

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Adobe v. Norwood, et al.: Stipulation re Continuance          - 3 -